UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

| UNITED STATES OF AMERICA |) | |
|--------------------------|---|-------------------|
| |) | |
| V. |) | 20-CR-10098 (WGY) |
| |) | |
| STEPHANIE POPP, |) | |
| STEPHANIE STOCKWELL, and |) | |
| VERONICA ZEA, |) | |
| |) | |
| Defendants |) | |

ASSENTED TO MOTION CONTINUE SENTENCING DATE

The United States of America respectfully moves the Court to continue the sentencing date for defendants Stephanie Popp, Stephanie Stockwell, and Veronica Zea from May 10, 2022 to a date convenient to the Court on or after July 11, 2022 (as to defendants Popp and Zea) and on or after September 2, 2022 (as to defendant Stockwell). As grounds for the motion, the government states as follows:

- 1. Defendants Popp, Zea, and Stockwell were charged by Information, and each pleaded guilty to the charges in that document on one of two dates in October 2020.
- 2. Each of the three defendants has entered into an agreement to cooperate with the government's investigation and prosecution of others in exchange for the possibility of a sentencing recommendation under U.S.S.G. § 5K1.1.
- 3. Two of the defendants' coconspirators, Jim Baugh and David Harville, are separately charged in an indictment, 20-CR-10263 (PBS). The Baugh-Harville matter is set for trial on May 31, 2022. The three defendants in this matter—Popp, Stockwell, and Zea—are each expected to testify in Mssrs. Baugh and Harville's trial.
 - 4. Accordingly, in order that the government have an opportunity to assess the extent

and nature of each defendants' cooperation, and to be in position to provide that assessment to the

Court at the time they are sentenced, the government requests that the Court continue their

sentencing dates as described above.¹ As it has previously indicated, the government may seek

similar relief again if the Baugh-Harville matter has not yet been tried as of that date.

5. Counsel for each of the three defendants has consented to the continuance on behalf

of their respective clients.

Respectfully submitted,

RACHAEL S. ROLLINS

United States Attorney

/s/Seth B. Kosto

SETH B. KOSTO

Assistant U.S. Attorney

March 22, 2022

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/Seth B. Kosto_ SETH B. KOSTO

Assistant U.S. Attorney

Dated: March 22, 2022

¹Counsel for defendant Stockwell begins a six-week racketeering trial in the United States District Court for the Northern District of California on July 16, 2022 and would not be available to travel to Massachusetts in connection with a July 2022 sentencing for Ms. Stockwell. The parties accordingly request that defendant Stockwell's sentencing be continued until after

September 2, 2022.